

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ELETSON HOLDINGS INC. AND ELETSON  
CORP.,

Petitioners/Cross-Respondents,

V.

LEVONA HOLDINGS, LTD.

Respondent/Cross-Petitioner.

Case No 1:23-cv-07331-LJL  
[rel. 24-cv-08672-LJL;  
24-cv-05096-LJL]

**Oral Argument Requested**

**NOTICE OF MOTION OF PETITIONERS ELETSON HOLDINGS INC. AND  
ELETSON CORP. FOR AN ORDER DISPLACING REED SMITH LLP AS COUNSEL  
OF RECORD AND REQUIRNG THAT REED SMITH LLP TURN OVER THE  
ELETSON CLIENT FILE TO SUBSTITUTE COUNSEL**

PLEASE TAKE NOTICE that upon the accompanying (i) Declaration of Adam Warren Spears dated January 7, 2025, and the exhibits thereto, (ii) Declaration of Timothy B. Matthews dated January 7, 2025, (iii) Declaration of Jennifer B. Furey dated January 7, 2025, and the exhibits thereto, (iv) Memorandum of Law dated January 7, 2025 (the “Memorandum”), and all prior proceedings in this action, Petitioners Eletson Holdings Inc. and Eletson Corp., by and through their undersigned counsel, will move the Court before the Honorable Lewis J. Liman, United States District Court Judge, Southern District of New York, at the Thurgood Marshall Courthouse, 40 Foley Square, New York, NY 10007, Courtroom 15C, on such date and at such time as the Court may direct, for an order (I) pursuant to Local Civil Rule 1.4(b) of the Court, displacing Reed Smith LLP as counsel of record in this matter, (II) pursuant to the inherent power of the Court and New York law as codified in *Matter of Sage Realty Corp v. Proskauer Rose Goetz & Mendelsohn*, 91 N.Y.2d 30 (1997), compelling the immediate turnover, to the undersigned substitute counsel, of

Reed Smith LLP's Eletson client file (to the extent described in the Memorandum), and (III) granting such other and further relief as the Court deems just and proper under the circumstances.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1, answering papers, if any, shall be served and filed within fourteen (14) days hereof.

Dated: January 7, 2025

/s/ Jennifer B. Furey

Jennifer B. Furey (admitted *pro hac vice*)  
Nathaniel R.B. Koslof (admitted *pro hac vice*)

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*Attorneys for Petitioners  
Eletson Holdings Inc. and Eletson Corp.*

**CERTIFICATE OF SERVICE**

I, Jennifer B. Furey, certify that on January 7, 2025, I caused the foregoing Notice of Motion to be filed with the Clerk of the Court and served on all counsel of record by electronic delivery via the ECF system.

/s/ Jennifer B. Furey  
Jennifer B. Furey